

Debtor 1 Clair E Kelly

Debtor 2 Brenda S Kelly  
(Spouse, if filing)

United States Bankruptcy Court for the: Western District of PA  
(State)

Case number 16-70837-JAD

## Form 4100R

## Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

## Part 1: Mortgage Information

Name of creditor: Carrington Mortgage Services, LLC Court claim no. (if known): 6-1

Last 4 digits of any number you use to identify the debtor's account: 2 6 0 4

Property address: 233 Hillcrest St  
Number Street

Northern Cambria, PA 15714  
City State ZIP Code

## Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

## Part 3: Postpetition Mortgage Payment

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 03 / 01 / 2022  
MM / DD / YYYY

- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ \_\_\_\_\_
- b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ \_\_\_\_\_
- c. **Total.** Add lines a and b. (c) \$ \_\_\_\_\_

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

    /    /      
MM / DD / YYYY

Debtor 1 Clair E Kelly Case number (if known) 16-70837-JAD  
First Name Middle Name Last Name

**Part 4:** Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

**Part 5:** Sign Here

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

Check the appropriate box::

- ☐ I am the creditor.  
☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

**X** /s/ Elizabeth K. Holdren  
Signature

Date 03 / 23 /2022

Print Elizabeth K. Holdren  
First Name Middle Name Last Name

Title Creditor's Counsel

Company Hill Wallack LLP

**If different from the notice address listed on the proof of claim to which this response applies:**

Address 21 Roszel Road, P.O. Box 5226  
Number Street

Princeton, NJ 08543  
City State ZIP Code

Contact phone ( 609 ) 734 - 6345

Email eholdren@hillwallack.com

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA  
(JOHNSTOWN)**

IN RE:

**Clair E Kelly  
Brenda S Kelly  
Debtor**

**Carrington Mortgage Services, LLC  
Movant**

v.

**Clair E Kelly  
Brenda S Kelly  
Respondent**

CHAPTER 13

CASE NO.: 16-70837-JAD

**CERTIFICATE OF SERVICE**

I certify under penalty of perjury that I served or caused to be served the above-captioned pleading, Response to Notice of Final Cure, on the parties below via First-Class Mail and Electronic Notification on March 23, 2022.

Clair E. Kelly  
233 Hillcrest Street  
Northern Cambria, PA 15714  
**Debtor**  
**Via Regular Mail**

Brenda S. Kelly  
233 Hillcrest Street  
Northern Cambria, PA 15714  
**Debtor**  
**Via Regular Mail**

Kenneth P. Seitz, Esquire  
P.O. Box 211  
Ligonier, PA 15658  
**Debtor's Counsel**  
**Via ECF**

Ronda J. Winnecour  
Suite 3250, USX Tower  
600 Grant Street  
Pittsburgh, PA 15219  
**Chapter 13 Trustee**  
**Via ECF**

United States Trustee  
Office of the U.S. Trustee  
Liberty Center  
1001 Liberty Avenue, Suite 970  
Pittsburgh, PA 15222  
**U.S. Trustee**  
**Via ECF**

Respectfully submitted,  
/s/Elizabeth K. Holdren, Esquire  
**Elizabeth K. Holdren, Esq., Atty ID**  
Hill Wallack LLP  
21 Roszel Road, P.O. Box 5226  
Princeton, NJ 08543  
609-734-6345  
[eholdren@hillwallack.com](mailto:eholdren@hillwallack.com)